

U.S. DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

2023
FILED

Karen Testerman, *pro se*
Lynn-Diane Briggs, *pro se*
Wayne Paul Saya, Sr., *pro se*
Plaintiffs

Vs

DAVID SCANLAN
SECRETARY OF STATE FOR NEW HAMPSHIRE, et al,
Defendants

Docket No.23-cv-00499-JL-AJ

**PLAINTIFF KAREN TESTERMAN *PRO SE* FOR LEAVE OF
THE COURT TO FILE MOTION TO AMEND COMPLAINT**

Now comes the Plaintiff, Karen Testerman, *pro se*, in the above-entitled and number action, hereby moves this honorable court pursuant to Fed. R. Civ. P. 15(a), to amend my complaint for the reasons as follows:

Explanation

Approximately two days ago, around December 10th, 2023, I filed a Motion to join Plaintiff Wayne Paul Saya, Sr. Motion to Amend his complaint, but while in the process of reviewing his amendments. I filed my motion for joinder expeditiously in an attempt to save time in light of a January 23, 2024 Presidential primary that is quickly becoming dangerously close. In reviewing Plaintiff Saya's amendments, I recognized ten(10) issues, the voting rights code was inaccurate, and the New Hampshire due process amendment and the U.S. 14th amendment was missing from claims 1, 2, 3 and 4,

described below, I believe these issues alone may be fatal to my and all Plaintiffs efforts. I would like these 10 total changes incorporated in my first and final amended complaint to make it easier for the Defendants to further understand my grievance. I believe it is best to address this immediately rather than causing future misunderstandings and delays that would most definitely create significant harm to this complaint and the court's time.

Leave of the Court, Leave of the court is requested to maintain the same Exhibits as used in support of the earlier Plaintiffs complaint and my original Affidavit, although I will be using my earlier-filed affidavit for my Thursday forthcoming "amended" Motion for Expedited Injunctive Relief.

Assent, In good faith I have spoken with both Plaintiffs by telephone and I have received their "assent" to my motion for Leave to amend the complaint. I will seek the "assent" of both of the Defendants prior to my filing of this motion to amend, and I will keep the court apprised each Defendant's response.

Change 1: I have replaced 52 U.S.C. § 21085 on pages 2, 3, 14, 15, and 17 with 52 U.S. Code § 10101 - Voting rights, and 42 U.S.C. 1973a(c), 3(c) - Voting and Elections.

Change 2: I have added the New Hampshire 15th amendment for due process of law to Count IV.

Change 3: I added the U.S. 14th amendment to Counts I and II.

Change 4: I changed article 14 to article 15 on page 2.

Change 5: I changed paragraph 12 to read 2024 and not 2023.

Change 6: I changed paragraph 22 to replace the word "letter" with "resolution"

Change 7: I changed paragraph 24 and struck-out the words "in the general election".

Change 8: I changed paragraph 34 and added the words "Presidential and"

Change 9: I changed paragraph 37 and to read "30-year" inhabitant.

Change 10: I changed the gender identity from "his" to "her" throughout the amended complaint.

Prayer for Relief

Therefore, I pray the court will accept and approve my motion, in the interest of justice, or for any reason this court may deem fair and just.

SWORN TO UNDER PAINS AND PENALTIES OF PERJURY THIS 13TH DAY OF DECEMBER, 2023.

Respectfully submitted,

Karen Testerman, Plaintiff, *pro se*
9 Stone Avenue
Franklin, New Hampshire 03235
Karen@karentesterman.com
603-721-9933

CERTIFICATE OF SERVICE

I, Karen Testerman, *pro se*, have caused to deliver the named Plaintiffs the following: PLAINTIFF KAREN TESTERMAN MOTION FOR LEAVE TO FILE MOTION TO AMEND COMPLAINT, and the foregoing documents have been served upon the following Defendants and Plaintiffs, via email and U.S. postage pre-paid:

David Scanlan, Defendant
Secretary of State of New Hampshire
ATTENTION: Brendan Avery O'Donnell
NH Department of Justice (Concord)
33 Capitol St
Concord, NH 03301
603-271-3650
Fax: 603-271-2110
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Chris Ager, Defendant
Chairman
New Hampshire Republican Party
ATTN: Attorney Bryan K. Gould
Cleveland, Waters, and Bass, P.A.
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Wayne Paul Saya, Sr., Plaintiff, *pro se*
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SWORN TO UNDER PAINS AND PENALTIES OF PERJURY this 13TH day of December, 2023.



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